

1 YI LIN ZHENG
2 Nevada State Bar No. 10811
3 Vegas Golden Law
4 500 Rose Street
5 Las Vegas, Nevada 89102
6 (702) 385-7170/Phone
7 vegasgoldenlaw@gmail.com

8 Attorney for Rene Ramirez

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10 **UNITED STATES DISTRICT COURT**
11 **DISTRICT OF NEVADA**
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13 UNITED STATES OF AMERICA,

14 Plaintiff,

15 v.

16 RENE RAMIREZ,

17 Defendant.

Case No. 2:15-cr-00289-JCM-CWH

**STIPULATION TO CONTINUE
REVOCATION HEARING**
(Second Request)

18 IT IS HEREBY STIPULATED AND AGREED, by and between Jason M. Frierson,
19 United States Attorney, and Supriya Prasad, Assistant United States Attorney, counsel for the
20 United States of America, and Yi Lin Zheng, counsel for Rene Ramirez, that the revocation
21 hearing currently scheduled for January 17, 2024 be vacated and set to a date and time
22 convenient to this Court, but no sooner than sixty (60) days.

23 The Stipulation is entered into for the following reasons:

24 1. The parties are nearing a conclusion to Mr. Ramirez's new federal case, 21-cr-
25 215-JAD-NJK.

26 2. The parties have requested an additional 60 days to resolve Mr. Ramirez's new
federal case.

3. Any resolution in Mr. Ramirez's new federal case will impact the resolution of
these revocation proceedings.

1 4. The parties agree to the continuance.

2 5. Mr. Ramirez is in custody and does not object to a continuance.

3 6. The additional time requested herein is not sought for purposes of delay, but
4 merely to allow counsel for defendant sufficient time within which to be able to effectively and
5 complete investigation of the discovery materials provided. Additionally, denial of this request
6 for continuance could result in a miscarriage of justice.

7 This is the second stipulation to continue filed herein.

8 DATED: December 12, 2023.

9 By /s/ Yi Lin Zheng

10 YI LIN ZHENG

11 Counsel for Rene Ramirez

JASON M. FRIERSON

United States Attorney

12 By /s/ Supriya Prasad

13 SUPRIYA PRASAD

14 Assistant United States Attorney
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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

v.

RENE RAMIREZ,

Defendant.

Case No. 2:15-cr-00289-JCM-CWH

FINDINGS OF FACT, CONCLUSIONS
OF LAW AND ORDER

FINDINGS OF FACT

Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court finds that:

1. The parties are nearing a conclusion to Mr. Ramirez's new federal case, 21-cr-215-JAD-NJK.

2. The parties have requested an additional 60 days to resolve Mr. Ramirez's new federal case.

3. Any resolution in Mr. Ramirez's new federal case will impact the resolution of these revocation proceedings.

4. The parties agree to the continuance.

5. Mr. Ramirez is in custody and does not object to a continuance.

6. The additional time requested herein is not sought for purposes of delay, but merely to allow counsel for defendant sufficient time within which to be able to effectively and complete investigation of the discovery materials provided. Additionally, denial of this request for continuance could result in a miscarriage of justice.

1 **CONCLUSIONS OF LAW**

2 The ends of justice served by granting said continuance outweigh the best interest of the
3 public and the defendant in a speedy trial, since the failure to grant said continuance would be
4 likely to result in a miscarriage of justice, would deny the parties herein sufficient time and the
5 opportunity within which to be able to effectively and thoroughly prepare for trial, taking into
6 account the exercise of due diligence.

7 **ORDER**

8 IT IS FURTHER ORDERED that the revocation hearing is continued to **March 20,**
9 **2024, at 10:30 a.m.**

10 DATED December 15, 2023.

11 
12 UNITED STATES DISTRICT JUDGE